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Sent: 6/29/2017 2:16:43 PM
To: Beslow, Mike [beslow.mike@epa.gov]; Mendez, Thomas [mendez.thomas@epa.gov]; sean.f.fitzgerald@uscg.mil
CC: Vansumeren, Timothy [timothy.vansumeren@arcelormittal.com]; Mathias, Cary [cary.mathias@arcelormittal.com]; Doyle, Kevin [Kevin.Doyle@arcelormittal.com]; Arnold, Paul S LT [Paul.S.Arnold2@uscg.mil]; Doyle, Kevin [Kevin.Doyle@arcelormittal.com]; Amendola Gary (g.amendola@amendola-eng.com) [g.amendola@amendola-eng.com]; Mathias, Cary [cary.mathias@arcelormittal.com]
Subject: Explanation of the Newfield's study results

Mike:

Yesterday I forwarded you a previous e-mail update that provides a simplified schematic of the IH CWTP operation, and the cooling water sewer, which is referred to as the "south sewer" in the third party report.

There were six samples of oil and/or oil sheens collected at IH CWTP as part of this study:

1. Cold rolling solution provided by U. S. Steel. This is unused (new) rolling solution used on the U. S. Steel cold rolling mill. Process wastewaters containing used rolling solution are discharged to the Central Wastewater Treatment Plant and are monitored at Outfall 101.
2. Oil collected at the influent to the Central Wastewater Treatment Plant containing oils from U.S. Steel ECTO operations.
3. Sample of oil sheen collected from behind the clarifier weir (trough) at the Central Wastewater Treatment Plant. There was no visible oil on the clarifier effluent at the time of sampling.
4. Oil collected from the USS south sewer (cooling water) that discharges directly to Outfall 001 and goes around the Central Wastewater Treatment Plant.
5. Two samples of oil sheen and material collected from inside the steel weir at Outfall 001.

As stated in the report, samples from the USS south sewer (No. 4 above) and samples from behind the steel weir at Outfall 001 (No. 5 above) matched, while the cold rolling solution (No. 1 above) and the samples at the CTP influent (No. 2 above) and at clarifier weir (trough) (No. 3 above) at the Central Wastewater

Treatment Plant did not match the samples from behind the Outfall 001 steel weir (No. 5 above).

This clearly shows the oil from the USS south sewer was the primary source of oil sampled from behind the steel weir at Outfall 001. The fingerprint of the oil found in the south sewer is not that of the cold rolling solution, but characteristic of lubricating or other oils.

With regard to actions taken, we have provided you periodic updates on our efforts to contain the oil sheen behind the steel weir at Outfall 001, including having K&M Industrial services onsite at the Outfall ten hours a day seven days a week. In addition, to eliminate oil sources upstream, we completed a number of extensive upgrades to the clarifiers at CWTP.

U. S. Steel is aware that they have oil sheen entering the cooling water sewer, and they have been attempting to isolate the source in the Tin Mill, and/or looking at ways to redirect those flows to the CWTP for treatment.

For several weeks we have been utilizing absorbent roll mats in the Outfall 001 steel weir area to absorb the oil sheen. The absorbent mats are left in the discharge area overnight every night, and replaced every day. We have found the mats to be quite effective in absorbing the oil sheen coming out of the sewer.

In addition, we have soft booms in position at the mouth of the Outfall. We have maintained precautionary multiple booms that have been in place for some time outside of the steel weir.

Please be advised that we commissioned the third-party study to better define the problem and to direct additional corrective measures by ArcelorMittal and U. S. Steel. At this point we believe we have effectively addressed possible visible oil contributions from the Central Wastewater Treatment Plant, and we believe the O&M measures described above are effective at minimizing oil discharges given current conditions. This is not a simple problem and it is likely that a number of corrective measures may be necessary.

ArcelorMittal and U. S. Steel plan to review the entire Outfall 001 issue at our meeting scheduled for July 12th, and we expect to discuss next steps to address the

situation. We understand your objective is to eliminate the oil sheens at Outfall 001 as soon as possible. We share that objective.

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From: Beslow, Mike [<mailto:beslow.mike@epa.gov>]
Sent: Wednesday, June 28, 2017 1:36 PM
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Subject: RE: Highlighted areas

Please correct me if I am incorrect, but I understand that the samples in 001 did not match the samples collected at USSteel (per the below statements out of the report).

a) Both oil sheens collected from behind the steel weir at Outfall 001 comprised a comparable type/mix of mineral oil(s), i.e., dearomatized lubricating and/or hydraulic oils.

b) The U. S. Steel cold rolling solution is composed of a non-petroleum (biological or synthetic) base oil. If it contributed to the oil sheens observed behind the Outfall 001 steel weir, the contribution was too small to be recognized using the methods used for this study.

Additionally, could you please provide the sewer maps that show the suspected source sewer is exclusive to US Steel. Finally, Please address the question: What immediate actions is Arcelor Mittal taking to stop the ongoing release at outfall 001? If releases at outfall 001 are not the responsibility of Arcelor Mittal, kindly explain to me why.

Mike Beslow

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From: Barnett, Thomas R [<mailto:Thomas.Barnett@arcelormittal.com>]
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Subject: Highlighted areas

Mike, see attached, per your request.